

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CONVERGEN ENERGY LLC, L'ANSE WARDEN  
ELECTRIC COMPANY, LLC, EUROENERGY  
BIOGAS LATVIA LIMITED, and LIBRA CAPITAL  
US, INC.

Plaintiffs,

-against-

STEVEN J. BROOKS, NIAN TICVISTA ENERGY  
LLC, GREGORY MERLE, RIVERVIEW ENERGY  
CORPORATION, DANIEL ESCANDON GARCIA,  
RAMON URIARTE INCHAUSTI, CHIPPER  
INVESTMENT SCR, SA, URINCHA SL, THEODORE  
JOHN HANSEN, BRIAN R. MIKKELSON, and  
CONVERGEN ENERGY WI, LLC,

Defendants.

Index No. **1:20-cv-03746** (LJL)

**DECLARATION OF DOV GOLD IN SUPPORT OF MOTION TO SERVE  
DEFENDANTS BY ALTERNATIVE MEANS OF SERVICE**

Dov Gold, being duly sworn, deposes and says as follows under penalty of perjury:

1. I am an Associate of the Seiden Law Group. I am licensed to practice in the State of New York and I submit this declaration in support of the Motion to Serve Defendants by Alternative Means of Service.

2. I represent Plaintiffs Convergen Energy LLC ("CE"), L'Anse Warden Electric Company, LLC ("Lanse"), and Libra Capital US, Inc. ("Libra").

3. On May 14, Vincent Filardo, an attorney from King & Wood Mallesons' New York office ("KWM") advised counsel for Plaintiffs that all "[a]ll further correspondence . . . on this matter should be directed to me." Subsequently, counsel for Plaintiffs' request of KWM to

confirm their clients' addresses was ignored. That email correspondence is attached as **Exhibit A**.

4. On May 18, 2020, a paralegal of Seiden Law Group emailed Spain's Central Authority asking if operations had stalled because of COVID-19. On May 19, the Head of Civil Legal Aid Service for Spain's Central Authority responded that they cannot guarantee the processing of all applications for the duration of the pandemic. The original Spanish email correspondence and certified translation is attached as **Exhibit B**.

5. According to corporate filings with Spain's Central Mercantile Register, Defendant Ramon Uriarte Inchausti is a representative and attorney in fact of Defendant Chipper Investment SCR SA, and president, advisor and attorney in fact of Defendant Urincha SL. Attached as **Exhibit C** are corporate filings from Spain's Central Mercantile Register.

6. Upon information and belief, Defendant Ramon Uriarte Inchausti's personal email is ruriarte@moninvest.es. On February 21, 2020, KWM emailed counsel for Plaintiffs, "[we] have received your email dated February 18, 2020, addressed to ruriarte@moninvest.es."

Dated: New York, New York  
June 18, 2020

/s/ Dov Gold  
Dov Gold